

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EGYPT HOUSE, Plaintiff,)	Civil Action No.: 25-10597-BEM
)	
)	
v.)	
)	
JOHN P. KELLEY, <i>et al.</i> ,)	
Defendants.)	

DECLARATION OF VERY REVEREND ARCHPRIEST NECTARIOS EBEN TREVINO

1. I am an archpriest incardinated in the Eastern American Diocese of the Russian Orthodox Church Outside of Russia. I have been a priest for over 23 years.

2. With the blessing of my bishop, His Eminence Metropolitan Archbishop Nicholas of New York, the First Hierarch of the Russian Orthodox Church Outside of Russia, I serve as an exorcist in North America for the Russian Orthodox Church Outside of Russia. I have been an exorcist for over 16 years.

3. I trained as an exorcist under Reverend Father Gabriel Amorth of the Diocese of Rome and am a member of the International Society of Exorcists.

4. In addition to my seminary training, I have a law degree from Georgetown University Law Center which I received in 1983.

5. In addition to casting out demons, the work of a priest-exorcist involves the consecration, care, and preservation of Holy Objects, Holy Vessels, and the altar of churches (which is an area of a church or chapel that includes, but is not limited to, the Holy Table, which is the main altar, side altars, and contains the Holy Vessels, Holy Objects, and often, but not always, is walled off by an iconostasis). Accordingly, I have a special concern for the Holy Objects, Holy Vessels, and the Altars of Egypt House because we have not yet been able to fabricate an iconostasis for the chapel (these can take many months or even years to carve and represent a major cost so it is normal to save for them). Based on my professional opinion, if the Town of Marblehead's Board of Assessors and Chairman DeFrancisco do not provide the minimis accommodations Father Andrew is requesting, the Holy Objects, Holy Vessels, and Altar of Egypt House will be desecrated.

6. Orthodox Catholics, *e.g.*, Greek Orthodox and Russian Orthodox, would refrain from worshipping in a desecrated chapel or a chapel which they know will be desecrated. Accordingly, I believe this to be a form of prior restraint according to the First Amendment as well as a violation of the Church Autonomy Doctrine.

7. The concern for the desecration at Egypt House is why I was sent to Boston with the blessing of Metropolitan Nicholas. We are concerned the Town of Marblehead may be in violation of the U.S. Constitution if it acts without restraint and desecrates the Egypt House chapel. We seek your cooperation.

8. In addition to other pilgrims who have traveled to Egypt House from across the country, with the blessing of my bishop, I have made a pilgrimage across state lines from Virginia to celebrate liturgical services, *e.g.*, Divine Liturgy, vespers, and matins, at the altar in the chapel of the monastic enclosure known as Egypt House, together with other pilgrims.

9. I have also celebrated religious feast days at Egypt House, such as the Feast of St. Nicholas the Wonderworker, the fourth century bishop of Myra.

11. I am aware of and have read letters from Reverend Father Paul Zuniga and Bishop Theophan of Philomelion, a priest and bishop who are both of the Albanian Diocese of the Ecumenical Patriarchate of Constantinople, who have also participated in religious activities at Egypt House. In addition to those public documents, my bishop and I have read other non-public documents which are protected by the seal of the confession and church autonomy doctrine.

12. Reverend Father Andrew (in the world, “Brian Andrew Bushell”), is a monk of the Orthodox Church, Protos of St. Paul’s Foundation and, *ex-officio*, the Superior of each of Egypt House, Emmaus House, and the Shrine of St. Nicholas the Wonderworker, all located in Marblehead, Massachusetts. Orthodox monks, not dissimilar from Roman Catholic monks, only use their first name in religious life. This is also why all Orthodox bishops only have one name — all bishops must first be monks.

13. During my pilgrimages to Egypt House, in addition to the chapel that contains two Holy Tables, an Analogion, Holy Vessels (such as the Chalice), Holy Relics, and the Holy Icons both inside and outside the altar area, Egypt House contains space for spiritual direction, religious programming and event space, guesthouse housing for pilgrims (some like myself who come from out of state), storage space for religious and consecrated objects, those things necessary for the good functioning of the building and grounds, the ministry, items to be installed in the Shrine of St. Nicholas the Wonderworker when it opens, and supplies for religious celebrations and feast days.

14. Egypt House is contiguous to Emmaus House, a part of the same monastic enclosure that provides housing for consecrated women and, in addition to an altar, Holy Icons, Holy Vessels, and Holy Relics, also contains office space for St. Nicholas and St. Paul’s Foundation, and storage space for religious objects and event space on the first floor, the ministry, as well as items to be installed in the Shrine of St. Nicholas the Wonderworker when it opens.

15. I have personally witnessed and venerated the Holy Relics contained within Egypt House. These are the relics of St. Andrew the First-Called of the Apostles, St. Basil the Great, St. Minas of Egypt, St. Boniface, St. Valerian of Rome, and a piece of the coffin of St. Nectarios of Aegina, Metropolitan of Pentapolis.

16. I personally have used the Holy Vessels of Egypt House.
17. I personally have venerated the Holy Icons at Egypt House.
18. I personally have preached and provided spiritual direction to others at Egypt House.
19. The Orthodox Church is a collection of co-equal churches that exist in harmony through the Holy Spirit as reflected in a common acceptance of canon law, theology, and practice. There is a hierarchy of canon law with the decrees of the Ecumenical Councils accorded first precedence.
20. I am concerned, taken out of context, the two thousand (2,000) year Orthodox Catholic tradition might seem unusual, and might be used to attack Father Andrew personally for upholding the canons of the Church. Accordingly, I offer a few examples from other faiths: a Carthusian Monastery would not admit non-approved visitors; a cloistered Carmelite monastery would not admit outsiders; a Mormon temple, such as the one in Belmont, Massachusetts, is reserved for Latter-Day Saints who meet certain standards of belief, practice, and ethics, *i.e.*, not only are non-Mormons are prohibited from entry, but also non-observant Mormons; one is not permitted into most Jewish synagogues without a covered head and, of course, most observant Orthodox Jews will not even enter the sanctuary of a Reformed or Conservative synagogue because they are not halachically correct, such persons reject many of the 13 Principles of the Jewish Faith by Rabbi Moshe ben Maimon (also known as Maimonides or the Rambam) and are, therefore, considered places of kefirah (heresy) by Orthodox Jews — therefore, the actual sanctuary may not be entered. I believe, given the foregoing, Father Andrew's requests are far less severe than that of Roman Catholic monastics, Mormons, or even Orthodox Jews.
21. If Father Andrew were to break or ignore the Holy Canons he would be immediately subject to deposition from his monastic office and a trial of excommunication.

/s/Very Reverend Nectarios Eben Trevino
Very Reverend Nectarios Eben Trevino Archpriest
and Exorcist
Russian Orthodox Church Outside of Russia
Eastern American Diocese

CERTIFICATE OF SERVICE

I certify I have retained the original wet copy signature for my records and a copy of the above Declaration of Very Reverend Archpriest Nectaros Eben Trevino was delivered via electronic mail on September 3, 2025, to the following parties:

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